

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

FIRTIVA CORPORATION

v.

FUNIMATION GLOBAL GROUP, LLC

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Case No. 2:21-CV-0111-JRG-RSP

**PLAINTIFF’S UNOPPOSED MOTION FOR ADOPTION OF
SUPPLEMENTAL PROTECTIVE ORDER**

Plaintiff Firtiva Corporation (“Firtiva”) hereby moves the Court for entry of a supplemental Protective Order in this case to govern discovery produced by non-party Google LLC (“Google”) and states as follows:

1. On or about October 18, 2021, Firtiva served Google with a subpoena *duces tecum* requesting certain categories of information and documents relevant to Firtiva’s claims in this Patent Action.

2. Firtiva and Google have conferred and agree that a supplemental Protective Order, attached hereto as **Exhibit A**, is necessary to preserve and protect any confidential or proprietary information that may be produced by Google.

3. Defendant Funimation Global Group, LLC (“Funimation”) does not oppose entry of the proposed supplemental Protective Order.

For these reasons, Firtiva requests this Court to enter the attached proposed supplemental Protective Order.

Date: January 6, 2022

Respectfully submitted,

FIRTIVA CORPORATION

By: /s/ Brian R. Landry w/permission Andrea L. Fair

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CERTIFICATE OF SERVICE

The undersigned certifies the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on this 6th day of January 2022.

/s/ Brian R. Landry w/permission Andrea L. Fair

CERTIFICATE OF CONFERENCE

I certify that, pursuant to Local Rule CV-7(i), counsel for Firtiva Corporation and Defendant Funimation Global Group, LLC have complied with the meet and confer requirement of the Court and Funimation's counsel does not object to entry of the attached protective order.

/s/ Brian R. Landry